

New Haven Register

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MAY 26 1992

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC. 20554

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FCC MAIL BRANCH

MAY 27 1992

Reference: CC Docket No. 92-90

Federal Communications Commission
Office of the Secretary

Dear Ms. Searcy:

May 22, 1992

Regarding the Federal Communications Commission Notice of Proposed Rulemaking issued in April to implement provisions of the Telephone Consumer Protection Act of 1991 please take note of the following:

Currently, the New Haven Register Circulation Department does not use artificial or pre-recorded messages with regard to debt collection. However, we do feel that for billing/collection purposes, pre-recorded or artificial voice calls should be exempt from this ruling. We concur with the FCC that the nature of this (not being telephone solicitation to increase sales) is to notify customers of debts due the newspaper. (Providing the company is in full compliance with state and federal laws.)

Regarding the implementation of a national database that would prohibit a newspaper from making even a single call to a potential customer:

Newspapers are a vital part of our society. Communities and individuals who have access to local newspapers benefit greatly by the infusion of information and civic responsibilities that are promoted and nurtured through the existence of the newspaper. Hence, telemarketing is an economical way of reaching customers. If an individual chooses to be included on a national database, he may not be offered the opportunity to receive our product, ever. Given human nature, we are prone to change our mind regarding decisions that seemed in our best interest at the time. We would then have no way of accessing current information regarding potential customers.

The New Haven Register currently uses an in-house system that automatically will put a potential customer on a "never call" list. We use an internal database which will delete an individual's phone number once the Telemarketing Service Representative fills out a form and then programs the information into the computer. We also follow up the call with a letter (see attached) apologizing to the individual for any inconvenience we may have caused.

New Haven Register

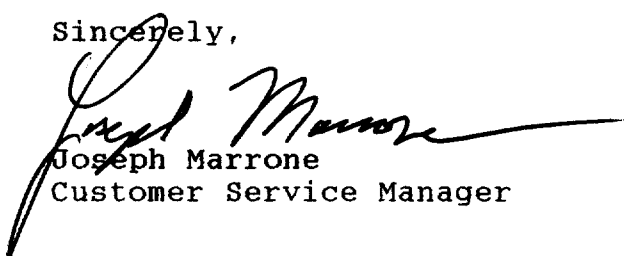
Since the New Haven Register is a valued part of the greater New Haven community, we make every effort to maintain a positive relationship with the communities we serve. As such, it would not be in the best interest of any newspaper to repeatedly solicit potential customers who clearly have no interest in receiving our product.

As you can see by our practice of never calling a customer who wishes not to be called, we are extremely concerned with maintaining a positive image with our non-subscribers.

The proposals you have made would seriously impair our ability to acquire new subscribers, and we ask you to reconsider.

Please let us know if any additional information is necessary.

Sincerely,



Joseph Marrone
Customer Service Manager

New Haven Register

Please accept our apology for any calls that were recently made to your home. We hope they did not cause you too much inconvenience.

We will immediately put your name on our "never call" list, which removes your number from our automatic dialing system.

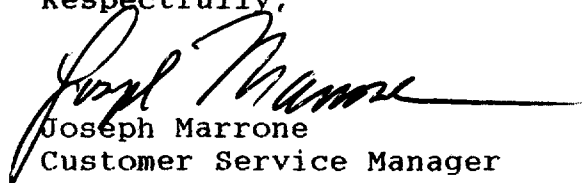
Telemarketing is used in a variety of ways. One of which is to offer you the New Haven Register at a substantial savings over what you would pay at the newsstand.

The New Haven Register has a vested interest and a long standing commitment to the people and communities we serve. As such, we would not want to jeopardize our position in the community by making repeated, unwanted calls to any individual that does not wish to receive our product.

Please call me if you need any additional information.

With sincere apologies.

Respectfully,



Joseph Marrone
Customer Service Manager